

**IN THE UNITED STATES DISTRICT COURT FOR  
THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MINTEL INTERNATIONAL GROUP,	)	
LTD., a United Kingdom corporation,	)	
	)	
	)	
Plaintiff/Counter-Defendant,	)	Case No. 08-cv-3939
	)	Judge Robert Dow, Jr.
v.	)	Magistrate Judge Maria Valdez
MEESHAM NEERGHEEN, an individual	)	
	)	
Defendant/Counter-Plaintiff.	)	
_____	)	

**JOINT MOTION TO EXTEND BRIEFING DEADLINES**

Defendant and Counter-plaintiff Meesham Neergheen (“Neergheen”) and Plaintiff and Counter-defendant Intel International Group, Ltd. (“Intel”)(collectively “the parties”) jointly move this Court to extend deadlines as related to briefing Intel’s motion for injunction. In support of their joint motion, the parties state as follows:

1. This Court entered an Agreed Order on July 25, 2008 setting the following briefing deadlines:

- Intel’s supplemental brief and Neergheen’s initial brief to be due on August 21, 2008; and
- Both parties’ reply briefs to be due on August 28, 2008.

2. Additionally, in the Agreed Order of July 25, 2008 the Court reset the injunction hearing in this matter to September 4, 2008.

3. Currently, the parties are actively pursuing discovery. There are, at-present, at least five (5) depositions noticed for the week of August 25-29, 2008. Additionally, responses to discovery requests are forthcoming.

4. The parties believe that the schedule regarding briefing on the injunction issues should be extended to allow for the orderly pursuit of discovery. The parties, therefore, jointly request the deadlines be extended and propose the following new deadlines:

- Intel's supplemental brief and Neergheen's initial brief to be due on August 28, 2008; and
- Both parties' reply briefs to be due on September 1, 2008.

5. The parties submit that the proposed schedule would not affect the hearing set for September 4, 2008, but would still allow for continued discovery to take place prior to briefing.

6. The parties respectfully submit that the request is not interposed for any improper purpose or delay.

WHEREFORE, based on the above, the parties respectfully request the Court enter the attached [Proposed] Order to Extend Briefing Deadlines.

Concurrence in the filing of this document has been obtained by Ms. Katherine Pronk, counsel for Intel.

Dated: August 20, 2008

Respectfully submitted,

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Plaintiff/Counter-Defendant,	)	Case No. 08-cv-3939
	)	Judge Robert Dow, Jr.
v.	)	Magistrate Judge Maria Valdez
MEESHAM NEERGHEEN, an individual	)	
	)	
Defendant/Counter-Plaintiff.	)	
_____	)	

**[PROPOSED] ORDER**

This cause having been heard before the Court on the parties' Joint Motion to Extend Briefing Deadlines, it is hereby ordered that:

1. Intel's supplemental brief and Neergheen's initial brief regarding Intel's Motion for Injunction shall be due on August 28, 2008; and
2. Both parties' reply briefs shall be due on September 1, 2008.

Dated: August \_\_\_\_, 2008

\_\_\_\_\_  
Hon. Robert Dow, Jr.

**CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies that a true and correct copy of **Joint Motion to Extend Briefing Deadlines**, and accompanying documents, have been served this 20<sup>th</sup> day of August, 2008 via ECF filing to:

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Katherine J. Pronk  
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